

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

FELIPE DE JESUS AVILA-SOTO, ET  
AL.

VERSUS

SOUTH CENTRAL SUGAR CANE  
GROWERS' ASSOCIATION, INC., ET  
AL.

CIVIL ACTION NO. 6:24-CV-01392

JUDGE ROBERT R.  
SUMMERHAYS

MAGISTRATE JUDGE CAROL B.  
WHITEHURST

**MOTION FOR EXPEDITED CONSIDERATION AND TO  
SET HEARING ON DEFENDANTS' MOTION TO COMPEL**

NOW INTO COURT, through undersigned counsel, come South Central Sugar Cane Growers' Association, Inc. and Sterling Sugars, LLC (collectively, "Defendants") who respectfully move this Court to set an expedited hearing, including oral argument, on Defendants' Motion to Compel Deposition Testimony of Plaintiffs, Canela and Soto (the "Motion"). Due to the approaching discovery deadline of February 23, 2026, and the reasons set forth more fully in the accompanying memorandum in support, expedited consideration of the Motion is warranted.

WHEREFORE, defendants, South Central Sugar Cane Growers' Association, Inc. and Sterling Sugars, LLC, respectfully move this Court to set hearing, including oral argument, on Defendants' Motion to Compel Deposition Testimony of Plaintiffs, Canela and Soto and to consider the Motion on an expedited basis.

Respectfully submitted,

**PHELPS DUNBAR LLP**

BY: /s/ Brandon E. Davis  
Brandon E. Davis Bar Roll No. 29823

Molly McDiarmid Bar Roll No. 36426  
Jennifer Clewis Thomas (*Admitted Pro  
Hac Vice*)  
Canal Place | 365 Canal Street, Suite 2000  
New Orleans, Louisiana 70130  
Telephone: 504 566 1311  
Facsimile: 504 568 9130  
brandon.davis@phelps.com  
molly.mcdiarmid@phelps.com  
jennifer.clewis@phelps.com

**ATTORNEYS FOR DEFENDANTS, SOUTH  
CENTRAL SUGAR CANE GROWERS'  
ASSOCIATION, INC. AND STERLING  
SUGAR, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of January 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record/parties in this proceeding.

/s/ Brandon E. Davis